# IN THE UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF PENNSYLVANIA (PHILADELPHIA)

IN RE:	)
CONSTANCE L. LAPHAM	)
DEBTOR	) CASE NO.: 2:22-bk-11004-mdc ) CHAPTER 13 ) JUDGE MARK J. CONWAY
US BANK TRUST NATIONAL ASSOCIATION,	)
NOT IN ITS INDIVIDUAL CAPACITY BUT	)
SOLELY AS OWNER TRUSTEE FOR	)
VRMTG ASSET TRUST	)
MOVANT	) )
CONSTANCE L. LAPHAM, DEBTOR, AND KENNETH E. WEST, TRUSTEE	) )
RESPONDENTS	, )
	<i>)</i>

### PRAECIPE TO WITHDRAW OBJECTION TO CONFIRMATION

#### TO THE CLERK OF THE BANKRUPTCY COURT:

Kindly withdraw the Objection to Confirmation of US Bank Trust National Association, Not In Its Individual Capacity But Solely As Owner Trustee For VRMTG Asset Trust which was filed with this Court on or about **June 6, 2022, docket number 19.** 

Respectfully submitted,

/s/ Joshua I. Goldman
Joshua I. Goldman, Esq.
Pennsylvania Bar #205047
PADGETT LAW GROUP
6267 Old Water Oak Road, Suite 203
Tallahassee, FL 32312
(850) 422-2520 (telephone)
(850) 422-2567 (facsimile)
josh.goldman@padgettlawgroup.com
Counsel for Creditor

# **CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished to the parties on the attached Service List by electronic notice and/or by First Class U.S. Mail on this the 2<sup>nd</sup> day of November 2022.

/s/ Joshua I. Goldman
Joshua I. Goldman, Esq.
Pennsylvania Bar #205047
PADGETT LAW GROUP
6267 Old Water Oak Road, Suite 203
Tallahassee, FL 32312
(850) 422-2520 (telephone)
(850) 422-2567 (facsimile)
josh.goldman@padgettlawgroup.com
Counsel for Creditor

# SERVICE LIST (CASE NO. 2:22-bk-11004-mdc)

DEBTOR CONSTANCE L. LAPHAM 25 DUTTON FARM LANE WEST GROVE, PA 19390

ATTORNEYS FOR DEBTOR
OSEPH F. CLAFFY
JOSEPH F. CLAFFY & ASSOCIATES, P.C.
26 SOUTH CHURCH STREET
SUITE 1 SOUTH
WEST CHESTER, PA 19382
CLAFFYLAW@GMAIL.COM

TRUSTEE
KENNETH E. WEST
OFFICE OF THE CHAPTER 13 STANDING TRUSTEE
1234 MARKET STREET - SUITE 1813
PHILADELPHIA, PA 19107
ECFEMAILS@PH13TRUSTEE.COM

U.S. TRUSTEE
OFFICE OF UNITED STATES TRUSTEE
200 CHESTNUT STREET
SUITE 502
PHILADELPHIA, PA 19106
USTPREGION03.PH.ECF@USDOJ.GOV